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Attorneys for Plaintiff Securities and Exchange Commission

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

THE ESTATE OF STEPHEN ROMNEY
SWENSEN, and CREW CAPITAL GROUP,
LLC, a Nevada limited liability company,

Defendants,

WENDY SWENSEN, an individual, SARIA
C. RODRIGUEZ, an individual, WS
FAMILY IP, LLC, a Utah limited liability
company, WINGMAN, LLC, a Utah limited
liability company, and SWENSEN
CAPITAL, LLC, a Utah limited liability
company,

Relief Defendants.

**STIPULATED MOTION TO MODIFY
SCHEDULING ORDER**

Case No.: 1:22-cv-00135-RJS-DBP

Judge: Robert J. Shelby

Magistrate Judge: Dustin B. Pead

Plaintiff Securities and Exchange Commission (“SEC”), Relief Defendant Wendy Swensen (“Ms. Swensen”), Relief Defendant Saria Rodriguez (“Ms. Rodriguez”), and Court-Appointed Receiver Chad Pehrson (“Receiver”; collectively, the “Parties”) stipulate as follows:

WHEREAS, on November 6, 2024, the Parties informed the Court that the SEC and Ms. Rodriguez were working to achieve an agreement in principle to settle this action (Dkt. 107);

WHEREAS, on November 8, 2024, the Court continued until February 13, 2025 and February 20, 2025, respectively, the deadlines for the SEC and Ms. Rodriguez to file dispositive and disgorgement motions and to request a scheduling order with the district judge for purposes of setting a trial date (Dkt. 109);

WHEREAS, the SEC and Ms. Rodriguez have since reached an agreement in principle to settle this action as to Ms. Rodriguez;

WHEREAS, on November 6, 2024, the Parties informed the Court that the SEC and Ms. Swensen had achieved an agreement in principle to settle this action (Dkt. 107), and the Court subsequently vacated all pretrial deadlines as to Ms. Swensen and ordered the SEC to file, by January 7, 2025, either a Consent to Final Judgement and a Proposed Final Judgment or a status report (Dkt. 109);

WHEREAS, on January 7, 2025, the SEC filed a Status Report informing the Court that on December 18, 2024, Ms. Swensen had signed a Consent to Final Judgement, which is subject to approval by the Commissioners of the SEC, and stating that the SEC would file, by March 31, 2025, either a Consent to Final Judgment and a Proposed Final Judgment as to Ms. Swensen or a further status report (Dkt. No. 118);

WHEREAS, in the interests of efficiency, the SEC intends to jointly seek Commission approval of the settlements involving Ms. Swensen and Ms. Rodriguez;

WHEREAS, Ms. Rodriguez needs to obtain and provide to counsel for the SEC additional information relating to her financial condition before the Commission may consider the proposed resolution as to her;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties that all pretrial deadlines are hereby vacated as to Ms. Rodriguez. The SEC will file, by April 15, 2025: (i) as to Ms. Swensen, either (a) a Consent to Final Judgment and a Proposed Final Judgment or (b) a further status report; and (ii) as to Ms. Rodriguez, either (a) a Consent to Final Judgment and a Proposed Final Judgment or a Stipulation of Dismissal signed by all parties who have appeared, or (b) a further status report.

Dated: February 12, 2025

/s/ Jason M. Bussey

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Receivership Defendants*

/s/ Thomas A. Brady²

Thomas A. Brady

Counsel for Relief Defendant Wendy Swensen

/s/ Raymond Malouf³

Raymond Malouf

Counsel for Relief Defendant Saria Rodriguez

¹ By Jason Bussey with permission from Jeremy Adamson.

² By Jason Bussey with permission from Thomas Brady.

³ By Jason Bussey with permission from Raymond Malouf.

CERTIFICATE OF SERVICE

I hereby certify that on February 12, 2025, I caused a true and correct copy of the foregoing document to be served via CM/ECF on the following:

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/s/ Jason M. Bussey
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